

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**MICHAEL PELTIER and  
KELLY PELTIER**

**Plaintiffs,**

**V.**

**STGJ ENTERPRISES, LLC D/B/A  
SMI AGENCY, LERETA, LLC, and  
WRIGHT NATIONAL FLOOD  
INSURANCE,**

## Defendants.



**CASE NO. 3:17-cv-00202**

**JOINT MOTION TO STAY MOTIONS AND  
RESET RULE 16 CONFERENCE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Plaintiffs MICHAEL PELTIER and KELLY PELTIER (“the Peltiers”), Defendant STGJ Enterprises LLC d/b/a SMI Agency (“SMI”), Defendant LERETA, LLC (“LERETA”), and Defendant WRIGHT NATIONAL FLOOD INSURANCE COMPANY (“Wright”), for the purpose filing this Joint Motion to Stay Pending Motions and Reset the Rule 16 Conference.

## I.

The parties have agreed to mediate this case within the next sixty (60) days. In the interest of economy, the parties respectfully ask this Court to (1) stay submission of the pending motions,<sup>1</sup> including any response or reply deadlines, by sixty (60) days and (2)

<sup>1</sup> [Doc. 22] (plaintiff's motion to remand); [Doc. 28] (Wright's Motion to Dismiss First Amended Complaint); [Doc. 29] (Wright's Motion to Dismiss First Amended Cross Claim); [Doc. 31] SMI's Motion for Leave to Amend]; [Doc.

reset the Rule 16 Conference currently set for October 3, 2017 until at least December 5, 2017. The parties will jointly notify the Court within sixty (60) days as to the status of mediation and whether the case settled.

WHEREFORE, the parties respectfully request that this Court enter an order:

- (1) Staying submission of the pending motions, specifically, [Doc. 22], [Doc. 28], [Doc. 29], [Doc. 31], [Doc. 40], and [Doc. 41], until at least December 5, 2017;
- (2) Staying any response or reply deadlines to said motions until at least December 5, 2017; and
- (3) Resetting the Rule 16 Conference until after December 5, 2017.

The parties further request any other relief to which they may show themselves justly entitled.

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40] (Lereta's Partial Motion to Dismiss First Amended Complaint); [Doc. 41] (Lereta's Partial Motion to Dismiss First Amended Crossclaim).

Respectfully submitted,

**GREER, HERZ & ADAMS, L.L.P.**

By: /s/ John A. Buckley, Jr.

John A. Buckley, Jr.  
State Bar No. 03300500  
So. Dist. of Texas No. 7601  
2525 South Shore Blvd., Ste. 203  
League City, Texas 77573  
P: 409-797-3200  
F: 866-409-7178  
Email: jrbuckley@greerherz.com

**Counsel for Plaintiffs Michael Peltier and  
Kelly Peltier**

and

**RAMZEY ZEIN-ELDIN & ASSOCIATES**

By: /s/ Ramzey Zein-Eldin

Ramzey Zein-Eldin  
State Bar No. 22256400  
Admitted Pro Hac Vice  
6511 Stewart Road, Suite 4  
P.O. Box 3951  
Galveston, Texas 77552  
P: 409-744-4357  
F: 409-740-0780  
Email: Ramzey543@gmail.com

**Counsel for Plaintiffs Michael Peltier and  
Kelly Peltier**

and

**ROYSTON, RAYZOR, VICKERY &  
WILLIAMS, L.L.P.**

By: /s/ Scott R. Breitenwischer  
Scott R. Breitenwischer State Bar No.  
02947695  
Federal ID No. 10827  
Christine Raborn  
State Bar No. 24044758  
Federal ID No. 931674  
Royston, Rayzor, Vickery & Williams,  
L.L.P.  
1600 Smith Street, Suite 5000  
Houston, Texas 77002  
P: 713-224-8380  
F: 713-225-9945  
Email:  
scott.breitenwischer@roytsonlaw.com;  
christine.raborn@roystonlaw.com  
**Counsel for Defendant STGJ Enterprises,  
LLC d/b/a SMI Agency**

and

**BECK REDDEN LLP**

By: /s/ Bryon A. Rice  
Bryon A. Rice  
State Bar No. 24065970  
Federal ID No. 1118643  
Jaqueline M. Furlow  
State Bar No. 24087551  
Federal ID No. 2191275  
Beck Redden LLP  
1221 McKinney Street, Suite 4500  
Houston, Texas 77010  
P: 713-951-3700  
F: 713-951-3720  
Email: brice@beckredde.com  
**Counsel for Defendant LERETA, LLC**

and

**FREEBORN & PETERS, LLP**

By: /s/ Alexander S. de Witt  
Alexander S. de Witt  
VA State Bar No. 42708 (Pro Hac Vice)  
411 East Franklin Street, Suite 200  
Richmond, Virginia 23219  
P: (804) 433-4790  
F: (804) 644-1354  
Email: adewitt@freeborn.com

**Counsel for Defendant Wright National  
Flood Insurance Company**

and

**BAKER & HOSTETLER, LLP**

By: /s/ Bradley K. Jones  
Bradley K. Jones  
State Bar No. 24060041  
Fed. ID 931122  
811 Main Street, Suite 1100  
Houston, Texas 77002  
P: 713-646-1379  
F: 713-751-1717  
Email: bkjones@bakerlaw.com

**Counsel for Defendant Wright National  
Flood Insurance Company**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2017, a true copy of the foregoing document was served upon all parties or their attorneys contemporaneously with or before the filing of this pleading, in a manner authorized by Federal Rule of Civil Procedure 5(b)(1), using this Court's CM/ECF system.

/s/ Bradley K. Jones  
Bradley K. Jones